

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

**CHARLES G FREDENBURG
AMY M FREDENBURG,**

DEBTOR.

**Case No.: BK-14-12559-R
Chapter 13**

OBJECTION TO CHAPTER 13 PLAN OF DEBTOR

Comes now the secured creditor, US Bank National Association as Legal Title Trustee for Truman 2013 SC3 Title Trust, by their attorney, Robert Hauge, and hereby objects to the Chapter 13 Plan of Debtor. In support of this Objection, US Bank National Association as Legal Title Trustee for Truman 2013 SC3 Title Trust would show the Court as follows:

1. US Bank National Association as Legal Title Trustee for Truman 2013 SC3 Title Trust is the holder of a purchase money note and mortgage on the residence, ("mortgaged property") of Debtor. Said note and mortgage has an outstanding balance of \$270,293.24 plus accruing interest along with reasonable attorney fees and for all costs of the action.

2. The proposed Chapter 13 Plan of the Debtor reflects an arrearage amount of \$60,000.00. US Bank National Association as Legal Title Trustee for Truman 2013 SC3 Title Trust disputes this amount and would propose that the correct arrearage amount is \$61,385.96 as evidenced by its Proof of Claim.

WHEREFORE, PREMISES CONSIDERED, secured creditor, US Bank National Association as Legal Title Trustee for Truman 2013 SC3 Title Trust, moves the Court to reject the proposed Chapter 13 Plan of Debtor and/or to grant adequate protection or such other and further relief as may be entitled.

US BANK NATIONAL ASSOCIATION AS
LEGAL TITLE TRUSTEE FOR TRUMAN
2013 SC3 TITLE TRUST,

By: s/ Robert Hauge
ROBERT HAUGE - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
Tulsa, Oklahoma 74136
Telephone: (918) 491-3100
Fax: (918) 497-5927
Attorney for Movant

CERTIFICATE OF SERVICE

I hereby certify that I mailed a true and correct copy of the above and foregoing Objection with postage thereon fully prepaid to the parties listed below on February 9, 2015.

Charles G Fredenburg
Amy M Fredenburg
8412 S. 4090 Road
Talala, OK 74080

The following persons should have received notice of the above and foregoing instrument on the same day it was filed by the Court's CM/ECF Electronic Noticing System.

Lonnie D. Eck
P.O. Box 2038
Tulsa, OK 74101

David L. Ashbaugh
219 South Lynn Riggs Boulevard
Claremore, OK 74017

By: s/ Robert Hauge _____
ROBERT HAUGE - #20007
Baer, Timberlake, Coulson & Cates, P.C.
6846 South Canton, Suite 100
Tulsa, Oklahoma 74136
Telephone: (918) 491-3100
Fax: (918) 497-5927
Attorney for Movant